



State of Ohio Environmental Protection Agency

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL

WARREN COUNTY

Application No: 14-05979

Fac ID: 1483040446

DATE: 1/17/2008

Burrows Paper Corporation
Peter Burkdorf
P.O. Box 987 501 West Main Street
Little Falls, NY 13365-0987

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern



Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES



Permit To Install
Terms and Conditions

Issue Date: 1/17/2008
Effective Date: 1/17/2008

FINAL PERMIT TO INSTALL 14-05979

Application Number: 14-05979

Facility ID: 1483040446

Permit Fee: **\$200**

Name of Facility: Burrows Paper Corporation

Person to Contact: Peter Burkdorf

Address: P.O. Box 987 501 West Main Street
Little Falls, NY 13365-0987

Location of proposed air contaminant source(s) [emissions unit(s)]:
2000 Commerce Center Drive
Franklin, Ohio

Description of proposed emissions unit(s):

Installation of one (1) new three color Bobst Masterflex-L flexographic sheet fed printing press.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air

contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	15.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (K002) - 3 Color Bobst Masterflex-L 80 inch x 50 inch maximum sheet size flexographic sheetfed printing press with 3 steam-heated non-contact dryers (dryer fuel burning emissions are associated with emissions unit B001)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Emissions of Volatile Organic Compounds (VOC) from the evaporation of solvents from inks and coatings shall not exceed 13.7 lbs/hour.</p> <p>See Part II terms and conditions A.2.a, A.2.b, and B.2.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Non-attainment New Source Review, Title V requirements and 40 CFR 63 Subpart KK requirements	<p>Emissions of VOC from the evaporation of solvents from inks and coatings shall not exceed 15.0 TPY based on a rolling, 12-month summation.</p> <p>See Part II terms and conditions A.2.c and B.1.</p>
OAC rule 3745-21-09(Y)(1)(a)(ii)	<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>

2. Additional Terms and Conditions

- 2.a The maximum VOC content of inks and coatings employed in this emissions unit shall not exceed 0.402 lb of VOC per gallon of ink or coating, as applied.
- 2.b The maximum VOC content of inks and coatings employed in this emissions unit shall not exceed 0.20 lb of VOC per gallon of ink or coating, as applied, based on a monthly volume weighted average of all inks and coatings employed.

- 2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from the following emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs: 21.5 MMBTU/hr Vapor Power natural gas and No. 2 fuel oil boiler (emissions unit B001), Fischer and Krecke 8-color station flexographic printing press with drying oven (emissions unit K001), Bobst Masterflex-L 3-color station flexographic printing press (emissions unit K002) and DuPont Cyrel Model 3000 printing plate developer, processor and dryer (emissions unit P001). Compliance with the above limitations shall be based on rolling, 12-month summations.
- 2.d** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the rolling, 12-month ink and coating usage limitation, VOC emissions, and HAP emission limitations and compliance with the VOC content limitations.
- 2.e** The hourly VOC emission limitation of 13.7 lbs/hr is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

- 1. The maximum annual ink and coating usage for this emissions unit shall not exceed 150,000 gallons per year, as applied, based upon a rolling, 12-month summation of the ink and coating usage figure.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cumulative usage level specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Coating Usage (Gallons)</u>
1	75,000
1-2	75,000
1-3	75,000
1-4	75,000
1-5	75,000
1-6	75,000
1-7	87,500
1-8	100,000
1-9	112,500
1-10	125,000
1-11	137,500

1-12

150,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage limitation shall be based upon a rolling, 12-month summation of the usage figure.

2. The permittee shall not employ cleanup materials in this emissions units which contain "organic compounds" as defined by OAC rule 3745-21-01(B)(4).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for emissions unit K002:
 - a. the name and identification number of each ink and coating, as applied;
 - b. the VOC content, in pounds per gallon of coating, for each ink and coating employed;
 - c. the number of gallons of each ink and coating employed;
 - d. the monthly volume-weighted average VOC content, as applied, for all inks and coatings, in lbs/gallon. The monthly volume weighted average shall be calculated by multiplying the VOC content in line b by the usage amount contained in line c for all inks and coatings employed during that month. The summation of these values should then be divided by the total gallons of inks and coatings employed during that month;
 - e. the permittee shall record the rolling, 12-month summation of the ink and coating usage figure, in gallons;
 - f. the permittee shall calculate and record the rolling, 12-month summation of the VOC emissions, in tons, from the evaporation of solvent from inks and coatings for each calendar month (e. multiplied by the volume weighted average VOC content as calculated for that month in d. multiplied by 1 ton/2000 lbs); and
 - g. an identification of each cleanup material which contains an "organic compound," as defined by OAC rule 3745-21-01(B)(4).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative ink and coating usage figure for each calendar month.

2. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.c:
 - a. the name and identification number of each ink and coating employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each ink and coating in pounds of individual HAP per gallon of ink or coating, as applied;
 - c. the total combined HAP content of each ink and coating in pounds of combined HAP emissions per gallon of ink or coating, as applied (sum all the individual HAP contents from b);
 - d. the number of gallons of each ink and coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAP emissions per gallon of cleanup material, as applied (sum all the individual HAP contents from f);
 - h. the number of gallons of each cleanup material employed;
 - i. the type and amount of fuel used in the facility;
 - j. the calculation of the individual and total HAP emissions from fuel burning at the facility;
 - k. the total individual HAP emissions for each HAP, in pounds or tons per month (for each HAP the sum of b times d for each ink and coating plus the sum of f times h for each cleanup material plus the HAP emissions from fuel burning);
 - l. the total combined HAP emissions, in pounds or tons per month (the sum of c times d for each ink and coating plus the sum of g times h for each cleanup material plus the HAP emissions from fuel burning);
 - m. the updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - n. the updated rolling, 12-month summation of usage for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

3. The permit to install for emissions unit K002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust systems, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethylene glycol

TLV (mg/m³): 73.7

Maximum Hourly Emission Rate (lbs/hr): 13.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 283

MAGLC* (ug/m³): 1755

Pollutant: ammonia

TLV (mg/m³): 17.41

Maximum Hourly Emission Rate (lbs/hr): 9.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 205

MAGLC* (ug/m³): 415

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month inks and coatings usage and/or VOC emission limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAP emission limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying inks and coatings (i.e., for VOC contents), including the monthly volume weighted average VOC content limit in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of a noncomplying cleanup material (i.e., for OC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

6. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation:**
Emissions of Volatile Organic Compounds (VOC) from the evaporation of solvents from inks and coatings shall not exceed 13.7 lbs/hour.

Applicable Compliance Method:

The hourly VOC emission limitation was developed from the following equation using the information submitted by the permittee in air PTI application number 14-05979, submitted on August 20, 2007:

$34 \text{ gallons of ink/coating/hour} \times 0.402 \text{ lb of VOC/gallon of ink/coating} = 13.7 \text{ lbs of VOC/hr}$

- b. **Emission Limitation:**
Emissions of VOC from the evaporation of solvents from inks and coatings shall not exceed 15.0 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be demonstrated by the record keeping requirement in term C.1.f.

The rolling, 12-month VOC emissions limitation was developed from the following equation using the information submitted by the permittee in ai PTI application number 14-05979, submitted on August 20, 2007:

$150,000 \text{ gallons of ink/coating/yr} \times 0.20 \text{ lb of VOC/gallon of ink/coating} \times 1 \text{ Ton}/2000 \text{ lbs} = 15.0 \text{ TPY of VOC.}$

- c. **Emission Limitations:**
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs based on rolling, 12-month summations of HAP emissions.

Applicable Compliance Method:

Compliance with the rolling, 12-month HAP emission limitations shall be demonstrated by the record keeping requirements in term C.2.

- d. **Emission Limitations:**
VOC content of inks and coatings shall not exceed 0.402 lb of VOC per gallon of ink or coating, as applied; and VOC content of inks and coatings employed shall

not exceed 0.20 lb of VOC per gallon of inks and coatings, as applied, based on a monthly volume weighted average of all inks and coatings employed.

Applicable Compliance Methods:

Compliance with the VOC content limitations shall be demonstrated by the following:

- i. for the maximum VOC content limit, USEPA methods 24 and 24A shall be used to determine the VOC content for flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A; and
 - ii. for the volume monthly weighted average VOC content limit, compliance shall be demonstrated by the record keeping requirement in term C.1.d.
2. Compliance with the maximum annual ink and coating usage limitation in term and condition B.1 shall be based on the record keeping requirements specified in term and condition C.1.
3. Compliance with the OC content limitation in term and condition B.2 shall be based on the record keeping requirements specified in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit to install are federally enforceable: A, B, C.1, C.2, D. and E.